

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA

B.P.J. by her next friend and mother, HEATHER JACKSON,

Plaintiff,

v.

WEST VIRGINIA STATE BOARD OF EDUCATION, HARRISON COUNTY BOARD OF EDUCATION, WEST VIRGINIA SECONDARY SCHOOL ACTIVITIES COMMISSION, W. CLAYTON BURCH in his official capacity as State Superintendent, DORA STUTLER in her official capacity as Harrison County Superintendent, and THE STATE OF WEST VIRGINIA,

Defendants,

and

LAINY ARMISTEAD,

Defendant-Intervenor.

Civil Action No. 2:21-cv-00316

Hon. Joseph R. Goodwin

DECLARATION OF TARA L. BORELLI

I, Tara L. Borelli, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am an attorney at Lambda Legal and counsel of record for Plaintiff B.P.J, with her next friend and mother, Heather Jackson. The following is true of my own personal knowledge, and, if called as a witness, I would and could testify competently thereto.

2. I submit this declaration in support of Plaintiff B.P.J.'s Opposition to Defendant-Intervenor and Defendant State of West Virginia's Motion to Exclude Expert Testimony of Dr. Deanna Adkins.

3. Attached to this declaration are true and correct copies of the documents listed in the table below:

| Exhibit | Description |
|---------|--|
| A | Endocrine Society, The Journal of Clinical Endocrinology & Metabolism, https://www.endocrine.org/journals/jcem . |
| B | Rafferty, Jason, et al., American Academy of Pediatrics, <i>Ensuring Comprehensive Care and Support for Transgender and Gender-Diverse Children and Adolescents</i> , Pediatrics, 142(4), October 2018, doi: 10.1542/peds.2018-2162. |
| C | Excerpt of Turban, Jack, et al., <i>Gender Incongruence & Gender Dysphoria</i> . In Martin A, Bloch MH, Volkmar FR (Editors): Lewis's Child and Adolescent Psychiatry: A Comprehensive Textbook, Fifth Edition. Philadelphia: Wolters Kluwer 2018. |
| D | The Royal Australian & New Zealand College of Psychiatrists, <i>Recognising and addressing the mental health needs of people experiencing Gender Dysphoria / Gender Incongruence</i> (Aug. 2021). |
| E | Rebuttal Expert Report and Declaration of Deanna Adkins, M.D. (March 11, 2022) |

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on May 26, 2022

/s/ Tara L. Borelli
Tara L. Borelli

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CHARLESTON DIVISION

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WEST VIRGINIA STATE BOARD OF
EDUCATION, HARRISON COUNTY BOARD
OF EDUCATION, WEST VIRGINIA
SECONDARY SCHOOL ACTIVITIES
COMMISSION, W. CLAYTON BURCH in his
official capacity as State Superintendent, DORA
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CERTIFICATE OF SERVICE

I, Loree Stark, do hereby certify that on this 26th day of May, 2022, I electronically filed a true and exact copy of the foregoing document with the Clerk of Court and all parties using the CM/ECF System.

/s/ Loree Stark

Loree Stark

West Virginia Bar No. 12936